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Counsel for Defendants  
PFIZER INC., PFIZER IRELAND  
PHARMACEUTICALS, and  
WARNER-LAMBERT COMPANY LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SANDRA HELLGREN, an individual, and  
BERNARD A. ORSI, an individual,

Plaintiffs,

v.

PFIZER, INC., a Delaware Corporation, PFIZER  
IRELAND PHARMACEUTICALS, an Irish  
partnership, WARNER-LAMBERT COMPANY,  
formerly a Delaware Corporation, WARNER-  
LAMBERT COMPANY LLC, a Delaware  
limited liability company, RANBAXY, INC., a  
Delaware Corporation, and DOES 1-10,

Defendants.

**Civil Action No.: 3:12-cv-0735 –JSW**

**FURTHER STIPULATION AND  
[PROPOSED] ORDER**

**United States District Judge  
Jeffrey S. White**

1 WHEREAS the Notice of Removal of Action from State Court in the above-captioned  
2 action was filed on February 15, 2012; and

3 WHEREAS Plaintiffs Sandra Hellgren and Bernard A. Orsi (collectively, "Plaintiffs")  
4 filed a Second Amended Complaint against Defendants Pfizer Inc., Pfizer Ireland  
5 Pharmaceuticals, and Warner-Lambert Company LLC (collectively, "Pfizer") on January 23,  
6 2012, attached hereto as Exhibit 1, and the new caption should read "ANITA J. COX, an  
7 individual; and SANDRA HELLGREN, an individual, Plaintiffs, v. PFIZER, INC, a Delaware  
8 corporation; PFIZER IRELAND PHARMACEUTICALS, an Irish Partnership; WARNER-  
9 LAMBERT COMPANY, formerly a Delaware corporation; WARNER-LAMBERT COMPANY  
10 LLC, a Delaware Limited Liability Company; RANBAXY, INC., a Delaware corporation; and  
11 DOES 1-10, Defendants; and

12 WHEREAS at least nine other actions have been filed in federal and state courts to date  
13 challenging Pfizer's allegedly anticompetitive conduct with regard to Lipitor and its generic  
14 competitors. A petition is currently pending before the Judicial Panel on Multidistrict Litigation  
15 ("JPML") to transfer and coordinate these related federal actions, including the above-captioned  
16 action, pursuant to 28 U.S.C. § 1407. *In re: Lipitor Antitrust Litigation*, MDL No. 2332. A  
17 hearing to consider the transfer and coordination of the actions in MDL No. 2332 is set for March  
18 29, 2012; and

19 WHEREAS Plaintiffs and Pfizer agree that the papers submitted in connection with the  
20 Notice of Removal will not be deemed defective in anyway due to the filing of the Second  
21 Amended Complaint, and

22 WHEREAS this Court has already granted Plaintiffs and Pfizer's Stipulation filed on  
23 February 24, 2012 ("Docket No 7") on this date and this Further Stipulation is being presented to  
24 clarify the operative complaint and does not, in anyway, alter or affect Docket No. 7.

25 WHEREAS Plaintiffs and Pfizer have met and conferred on this issue in good faith;

26 IT IS HEREBY STIPULATED AND AGREED, by Plaintiffs and Pfizer, through their  
27 respective counsel, that the deadline for Pfizer to answer or otherwise respond to Plaintiffs'  
28

1 Second Amended Complaint shall be extended to fourteen (14) days after the date the JPML  
2 issues a ruling or decision regarding transfer and consolidation of actions in MDL No. 2332. The  
3 parties reserve their right to discovery in accordance with the Federal Rules of Civil Procedure  
4 and/or Civil Local Rules.

5  
6 Respectfully submitted,

7  
8 Dated: March 2, 2012

/s/ Bijal V. Vakil

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16 Counsel for Defendants  
17 PFIZER INC., PFIZER IRELAND  
18 PHARMACEUTICALS, and  
19 WARNER-LAMBERT COMPANY LLC

20  
21 Dated: March 2, 2012

/s/ Lawrence G. Papale

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28 Counsel for Plaintiffs  
SANDRA HELLGREN and BERNARD A. ORSI

WHITE & CASE LLP  
ATTORNEYS AT LAW  
SILICON VALLEY

ATTESTATION CLAUSE

I, Bijal V. Vakil, hereby attest in accordance with General Order No. 45.X that Lawrence G. Papale, Counsel for Plaintiffs has provided his concurrence with the electronic filing of the foregoing document entitled **FURTHER STIPULATION AND [PROPOSED] ORDER**.

Dated: March 2, 2012

WHITE & CASE LLP

By: /s/ Bijal V. Vakil

Bijal V. Vakil

Counsel for Defendants  
PFIZER INC., PFIZER IRELAND  
PHARMACEUTICALS, and  
WARNER-LAMBERT COMPANY LLC

ORDER

Pursuant to the above Stipulation filed in this action, it is hereby ORDERED that the time within which Defendants Pfizer Inc., Pfizer Ireland Pharmaceuticals, and Warner-Lambert Company LLC may answer or otherwise respond to Plaintiffs' Second Amended Complaint is hereby extended to fourteen (14) days after the date the Judicial Panel on Multidistrict Litigation ("JPML") issues a ruling or decision regarding the transfer and coordination of actions in *In re: Lipitor Antitrust Litigation*, MDL No. 2332.

Dated: March 5, 2012

  
JEFFREY S. WHITE  
UNITED STATES DISTRICT JUDGE